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January 16, 2015

VIA E-MAIL

The Honorable Hildy Bowbeer
Magistrate Judge, U.S. District Court
632 Federal Building
316 North Robert Street
St. Paul, MN 55101

Re: *Skky v. Manwin USA, Inc. and Manwin Holding s.a.r.l.* (13-cv-2086); *Skky v. Playboy Enterprises, Inc.* (13-cv-2089)

Dear Magistrate Bowbeer:

In accordance with the Court's Order on January 8, 2015, the parties provide their respective list of discovery disputes to be resolved at the teleconference on January 23, 2015. The parties will continue to discuss the issues during the week to further narrow the issues to be raised at the teleconference.

Plaintiff Skky, Inc.'s List of Issues as to all Defendants:

- Extension of the deadline to complete fact witness depositions.

Plaintiff Skky, Inc.'s List of Issues as to Defendants Manwin:

- Manwin's refusal to produce Google Analytics reports for the accused websites.
- Manwin's failure to provide/deficient production of certain categories of relevant documents (such as marketing and business strategy documents; contracts and documents related to third party service providers; agreements, prospectuses, and presentations related to mobile technology; site specific revenue information for newly identified sites; asset purchase agreements; realitykings.com technical documents).
- Manwin's deficient Interrogatory responses (Nos. 1, 3, 6, 9, 11, 10, and 13).
- Continued errors, deficiencies in documents produced by Manwin (such as unreadable pages).

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Plaintiff Skky, Inc.'s List of Issues as to Defendant Playboy:

- Playboy's incomplete interrogatory responses (specifically, incomplete responses to Interrogatory Nos. 1, 2, 3, 6, 7, 10, 11)
- Playboy's failure to produce entire categories of documents responsive to many document requests (such as, but not limited to, Google analytics and documents Manwin has been contractually required to provide to Playboy).
- Playboy's failure to produce any documents from custodians with strong and direct ties to Playboy's digital online/mobile business (such as Jimmy Jellinek, Josh Schollmeyer, Hazel Thomson, Phillip Morelock, Rachel Melville, etc.).

Defendants' Manwin and Playboy List of Issues:

- Stipulation for representative sites.

In addition to the issues identified above, the parties are more than willing to discuss any other case management issues the Court would like to address at the teleconference.

Respectfully submitted,



Ryan M. Schultz
Counsel for Skky, Inc.

/s/ Tamany Vinson Bentz (with permission)

Tamany Vinson Bentz
Counsel for Defendants